

## Exhibit 160

Plaintiffs' Corrected Averment of Jurisdictional Facts and  
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1

## FEDERAL BUREAU OF INVESTIGATION

**Precedence:** IMMEDIATE**Date:** 09/27/2001**To:** Counterterrorism**Attn:**

(G)

(G)

New York  
San Diego  
Cleveland  
Richmond  
Washington FieldSA  
SA  
SA  
SA

(S)

**From:** Portland

(G)

**Contact:** SA

(S)

**Approved By:**

(S)

**Drafted By:****Case ID #:**

(F)

**Title:** PENTTBOMB  
MAJOR CASE 182**Synopsis:** To provide additional/updated information regarding Abdallah Al-Towayan, aka, [REDACTED] (G) and to request that Legat, [REDACTED] (G) attempt to verify Al-Towayan's current location as being in Riyadh, Saudi Arabia.**Reference:** [REDACTED] (F)**Details:** The Portland Division has initiated extensive efforts for several days to locate and interview Abdallah Al-Towayan, aka Towayan Al-Towayan [REDACTED] (G) Al-Towayan has had significant direct and indirect contacts with several subjects and active participants in the World Trade Center (WTC) attacks. A description of these contacts along with additional/updated investigative details are provided below for the information of all recipients:

To: Counterterrorism From: Portland  
 Re: [REDACTED] (F) 09/27/2001

INVESTIGATION AT SAN DIEGO

Investigation at San Diego has determined that subject from Flight 77, Khalid M. Al-Mihdhar and Nawaf M. Al-Hazmi, lived in San Diego, California. A records check of the California Department of Motor Vehicles reported that Nawaf Al-Hazmi listed [REDACTED] (P)

(P) San Diego, California, as his residence when he applied for a driver's license on or about 04/05/2000. This was confirmed by the records and [REDACTED] (P) the Parkwood Apartments, [REDACTED] (P) (P) San Diego, California. According to the rental records, Al-Mihdhar and Al-Hazmi both moved into apartment [REDACTED] (P), Parkwood Apartments, [REDACTED] (P) San Diego, California, on 02/05/2000.

The rental application shows that Al-Mihdhar and Al-Hazmi resided with Omar A. Al-Bayoumi at apartment [REDACTED] (P) of the same apartment complex, San Diego, California, before renting apartment [REDACTED] (P). Prior to that, Al-Mihdhar and Al-Hazmi claimed they were in Saudi Arabia. Interviews conducted at the Parkwood Apartments have reported that other residents recognized the photograph of hijacker Hani Hanjour as visiting the apartment complex. No records have been found that confirm Hanjour's presence at the apartment complex.

The term of Al-Mihdhar and Al-Hazmi's lease was for four months. Al-Bayoumi was listed as the guarantor and co-signer because Al-Mihdhar and Al-Hazmi did not have established credit. Al-Mihdhar and Al-Hazmi vacated the apartment on 05/31/2000, and left no forwarding address.

The records of the Parkwood Apartments show that Omar Ahmed Al-Bayoumi and his wife Manal A. Bagader, with their children, [REDACTED] (P-1) (P-1) moved out of their apartment on 06/23/2001. (Al-Bayoumi is currently being detained by New Scotland Yard in London, England, for interview regarding this matter.)

Contact with the U.S. Postal Service determined a mail forwarding notice was submitted for Omar Al-Bayoumi on 06/23/2001. The notice requested all mail delivered to Al-Bayoumi at apartment [REDACTED] (P) be forwarded to apartment [REDACTED] (P). Contact with the apartment management has determined the occupant of apartment [REDACTED] (P) during June 2001 was Abdallah Al-Towayan.

Review of rental records has determined Abdallah Al-Towayan, [REDACTED] (P-1), moved into [REDACTED] (P) San Diego, California, on 04/06/2001, and moved out 08/05/2001. Al-Towayan was accompanied by his wife, [REDACTED] (P) and daughter [REDACTED] (P). Rental records further indicate Al-Towayan held Oregon Identification Card [REDACTED] (P-1) issued 10/18/2000. expires 09/02/2008. The Identification Card listed an address of [REDACTED] (P) Portland, Oregon 97203.

Interviews conducted at San Diego have also identified Al-Towayan as having contact with Hani Hanjour, one of the hijackers

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of American Airlines Flight 77 which crashed into the Pentagon. Al-Towayan has been identified as being the recipient of a desk moved from Al-Bayoumi's apartment during June 2001. Although Al-Bayoumi was not present when the desk was moved, a witness has identified Hani Hanjour as having helped move the desk from Al-Bayoumi's apartment to Al-Towayan's.

Al-Towayan was reported by a witness to have said he was leaving San Diego to study English at the University of Oregon. This individual's only known identification in the United States is an Oregon Identification Card [REDACTED] (P-1), address 5000 North Willamette Boulevard, Portland, Oregon, which is, in fact, the address to the University of Portland. The last known contact with Al-Towayan indicated that he had lived previously and had specific plans to return to the State of Oregon. In addition, Al-Towayan's last known verifiable physical address is [REDACTED] (P) [REDACTED] (P) Portland, Oregon. He stayed at this address, prior to his San Diego address, (at which he resided September to October 2000) with his landlords. These individuals have been interviewed with no positive information as to his whereabouts.

An affidavit to obtain a Material Witness Warrant for Al-Towayan was taken to [REDACTED] (G) on 09/25/2001 by WFO and it is anticipated that it will be issued in the near future.

#### INVESTIGATION AT RICHMOND, VIRGINIA

(O-1) Pursuant to a query of the [REDACTED] (O-1) [REDACTED] (P-1), information regarding Walid Al-Towayan, Saudi Arabian passport [REDACTED] (P-1) was located which indicated that he has the same date of birth as Abdallah Al-Towayan and is currently in the U.S. [REDACTED] (J-3) with [REDACTED] (J-3).

(P) [REDACTED] (P) resides at [REDACTED] (P) or (P) Richmond, Virginia. He is currently enrolled as a student at the [REDACTED] (P) in Richmond and is due to begin classes on 10/16/2001.

On 09/25/2001, [REDACTED] (P) was interviewed by the Richmond Division, at which time it was determined that he is not a relative of Abdallah Al-Towayan and did not recognize him whatsoever.

#### INVESTIGATION AT EUCLID (CLEVELAND), OHIO

(A), (G), (J-1), (D) [REDACTED]

On 09/24/2001, [REDACTED] (P) was interviewed and advised that he is about to receive his Masters degree in Accounting and is applying

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for Ph.D. programs around the country. [REDACTED] (P) was cooperative and provided the following information regarding Al-Towayan:

[REDACTED] (P) Al-Towayan has been a [REDACTED] (P); [REDACTED] (P) [REDACTED] (P) in a small farm community in Saudi Arabia. He last saw Al-Towayan approximately two years ago but last spoke to him in July 2001.

Al-Towayan is employed by Al-Rajhi, an investment firm located in Riyadh, Saudi Arabia. Al-Towayan is in the Compliance Section where he reviews contracts for their compliance with company rules as well as Islamic laws. Al-Towayan is in the U.S. to study English at the behest of Al-Rajhi which is paying for all of his related costs. The Riyadh telephone number for Al-Rajhi is (Country Code) [REDACTED] (P-1)

Al-Towayan was once arrested in Saudi Arabia at a demonstration for which he was imprisoned for four months in a "Political Prison," until [REDACTED] (P)

[REDACTED] (P) [REDACTED] (P) identified Al-Towayan's email address as [REDACTED] (P)

[REDACTED] (P) offered to attempt to telephonically contact any of three telephone numbers he has related to Al-Towayan in Saudi Arabia to try to locate him through his relatives; the telephone numbers in Saudi Arabia are as follows:

Country Code 966:

[REDACTED] (P-1) (Al-Towayan's personal cell phone he has left with his brother, Abdulaziz Al-Towayan);

[REDACTED] (P-1) (Al-Towayan's family cell phone)

[REDACTED] (P-1) (Al-Towayan's family home telephone)

On 09/25/2001, [REDACTED] (P) made telephonic contact with one of Al-Towayan's brothers, Solaiman Al-Towayan (his other brother's name is Abdulaziz Al-Towayan) on Al-Towayan's personal cell phone noted above.

Solaiman advised that Abdallah is in Saudi Arabia and could be contacted at the Al-Rajhi office.

[REDACTED] (P) [REDACTED] (P) advised that Al-Towayan did not have a twin brother named [REDACTED] (P)

#### INVESTIGATION AT PORTLAND, OREGON (Updated Information)

On 09/22/2001, [REDACTED] (P) was interviewed. Al-Towayan [REDACTED] (P) from 8/2000 through 10/2000 when he departed Portland, according to [REDACTED] (P) The [REDACTED] (P) have often

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(P) English language students from the University of Portland. Although Al-Towayan only (P) two months, they had many discussions regarding religion, military, and government issues. (P) specifically noted that after the attacks that if the FBI was going to investigate any of his former Middle Eastern (P), Al-Towayan would be the one he suspected.

(P) [REDACTED] recalled speaking with Al-Towayan about the attack on the USS Cole in Yemen (attack on 10/12/2000). The topic of the conversation turned to Usama Bin Laden. Al-Towayan advised that the U.S. will never catch Bin Laden and that he would support the "holy war" if it occurred. Al-Towayan stated that if this war became imminent, he would get on the next flight home and fight along side his people, although Al-Towayan did not specifically identify who his people were.

Al-Towayan disliked the U.S. government for providing funds to Israel but not to the Palestinians. (P) [REDACTED] did state that Al-Towayan did not support terrorism.

FBI Portland has coordinated with the [REDACTED] (G)  
(G) [REDACTED] representatives (O-1)  
(U-1) [REDACTED] who are forwarding (O-1)  
(O-1) [REDACTED], regarding the below lead to Legat [REDACTED] (G) to attempt  
to coordinate their attempts to confirm that Al-Towayan is currently  
in Saudi Arabia.

Portland will forward two scanned photos of Al-Towayan, one from his Oregon state identification card and one from his visa to (a) Legat (G) (b) (G) and (c) (G)

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Re: [REDACTED] 09/27/2001

**Descriptive Data:**

Main Subject

Name -  
Last: Al-Towayan  
First: Abdallah  
Race: U  
Sex: M  
DOB: (P-1)  
DLN: Oregon State Identification  
PNO: Card Number (P-1)  
Alias(es) -  
Last: Al-Towayan  
First: Towayan  
Middle: Abdallah  
Address(es) -  
House #: (P)  
Pre Direction: North  
Street Name: Portsmouth  
City: Portland  
State: OR

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Re: [REDACTED] (F) 09/27/2001

**LEAD (s) :**

**Set Lead 1:**

ALL RECEIVING OFFICES

Read and clear.

**Set Lead 2:**

(G)

AT

(G)

Attempt to discreetly confirm the current location of Abdallah Al-Towayan, aka, in Riyadh, Saudi Arabia, and advise the Portland Division of investigative initiatives and results; due to the sensitivity of this investigation and a forthcoming Material Witness warrant, no attempt to interview should be conducted.

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